

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Jointly Administered Under
Bankruptcy Case No. 17-42726 (KHS)

Chapter 11

WYNIT DISTRIBUTION, LLC,

Bky. Case No. 17-42726

WD Navarre Distribution, LLC

Bky. Case No. 17-42728

WD Encore Software, LLC

Bky. Case No. 17-42729

WD Navarre Holdings, LLC

Bky. Case No. 17-32864

WD Navarre Digital Services, LLC

Bky. Case No. 17-32865

WYNIT Holdings, Inc.

Bky. Case No. 17-32866

WD Navarre Canada, ULC,

Bky. Case No. 17-32867

Debtors.

**NOTICE OF RECLAMATION DEMAND OF KAIJET TECHNOLOGY
INTERNATIONAL LIMITED, INC.**

PLEASE TAKE NOTICE that on September 28, 2017, Kaijet Technology International Limited, Inc., on behalf of itself and its affiliates, subsidiaries, and divisions (“Kaijet”), delivered a letter to the Debtors, and their counsel, asserting reclamation demands pursuant to section 546(c) of the Bankruptcy Code (the “Demand Letter”).

PLEASE TAKE FURTHER NOTICE that a copy of the Demand Letter is attached hereto and incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that Kaijet reserves all rights under section 503(b)(9) of the Bankruptcy Code, including with respect to any of the goods identified in the Demand Letter that were delivered within 20 days of the petition date. Kaijet further reserves the right to recover from, or exercise any other remedy against, any Debtor that has possession, custody, or control over the goods, or is responsible for payment with respect to the same.

Kaijet hereby makes written demand to the Debtors for reclamation of the goods that are the subject of the letter and associated documents attached hereto as Exhibit A pursuant to Minn. Stat. § 336.2-702, 11 U.S.C. § 546(c), and other applicable law.

Respectfully submitted,

BASSFORD REMELE
A Professional Association

Dated: September 28, 2017

By: /e/ Jeffrey D. Klobucar
Jeffrey D. Klobucar (#0389368)
100 South Fifth Street, Suite 1500
Minneapolis, MN 55402
jklobucar@bassford.com
Telephone: (612) 333-3000
Facsimile: (612) 333-8829

*Attorneys for Kaijet Technology
International Limited, Inc.*

EXHIBIT A

BASSFORD REMELE

JEFFREY D. KLOBUCAR
ATTORNEY
Licensed in MN and WI
T 612.376.1639
F 612.746.1239
JKLOBUCAR@BASSFORD.COM

September 28, 2017

VIA EMAIL AND U.S. MAIL

WYNIT Distribution, LLC
c/o Robert Kugler, Esq.
Stinson Leonard Street, LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55402
robert.kugler@stinson.com

WYNIT Distribution, LLC
700 West 76th Street, Suite 116
Eden Prairie, MN 55344

Re: *In re: WYNIT Distribution, LLC*
Bky. Case No.: 17-42726
Notice of Reclamation

To whom it may concern:

This firm represents Kaijet Technology International Limited, Inc. ("Kaijet"), a creditor of WYNIT Distribution, LLC and affiliated entities. (the "Debtor"). Kaijet has now learned the Debtor filed a voluntary petition for bankruptcy under Title 11, Chapter 11, of the United States Code (the "Bankruptcy Code") on September 8, 2017. Kaijet holds certain claims against the Debtor for failure to make payments for goods shipped to the Debtor.

Section 546(c) of the Bankruptcy Code, in conjunction with the applicable state codification of U.C.C. § 2-702(2), permits Kaijet to reclaim the goods it sold to the Debtor and delivered within forty-five days of September 8, 2017. Certain goods have been shipped to the Debtor within that time period as set forth in the enclosed invoices.¹ Kaijet hereby makes written demand for return and reclamation of all goods delivered to the Debtor within the forty-five days preceding the commencement of the Debtor's bankruptcy case.

You are further notified that all goods subject to Kaijet's right of reclamation should be protected and segregated by the Debtor and are not to be used for any purpose whatsoever except those purposes specifically authorized following notice and a hearing by the Bankruptcy Court.

¹ The invoices attached to Exhibit 1 have been redacted to omit proprietary pricing information. Unredacted copies of the invoices can be made available to the Debtors upon request.

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Further, this demand should not be construed to limit Kaijet's right to recover from or exercise any other remedy against any Debtor that has possession, custody, or control over the goods that are the subject of this demand or is responsible for payment with respect to the same.

Kaijet expressly reserves its rights under Section 503(b)(9) of the Bankruptcy Code to assert an administrative expense claim for the value of any goods delivered to the Debtors within 20 days prior to the petition date.

Please contact me upon receipt of this letter in order to make arrangements for Kaijet to reclaim its goods.

Respectfully,

Jeffrey D. Klobucar
for

BASSFORD REMELE, A Professional Association

JDK:plc
Enclosures
cc:

Kaijet Technology International Limited,
1025 Cobb International Drive Suite 210
GA 30152

Invoice

Date	Invoice #
9/25/2017	3230575

Bill To
Wynit Kathy Burton WD Navarre Canada, ULC 9700 W 76th Street Suite 116 Eden Prairie, MN 55344

Ship To
WD Navarre Canada ULC 450 Export Blvd Unit A Mississauga, ON L5S 2A4 Canada

S.O. No.	P.O. No.	Terms	Project
3230575	3230575	[REDACTED]	

Item	Description	Ordered	Prev. Inv...	Backor...	Invoiced	Rate	Amount
JUP-50	40W 5-PORT USB Super Charger	[REDACTED]	0	0	[REDACTED]	[REDACTED]	4,970.25
JDA-154	JDA154 Display Port to HDMI Adapter	[REDACTED]	0	0	[REDACTED]	[REDACTED]	9,667.00
JDA-159	Mini DisplayPort to HDMI 4K Adapter - 847626000737	[REDACTED]	0	0	[REDACTED]	[REDACTED]	2,345.00
	FedEx Freight Tracking #3811287885						

	Total	\$16,982.25
	Payments/Credits	\$0.00
	Balance Due	\$16,982.25

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Debtors.

UNSWORN DECLARATION FOR PROOF OF SERVICE

I, Jeffrey D. Klobucar, an attorney licensed to practice law in this Court, with an office address of 100 South Fifth Street, Suite 1500, Minneapolis, MN 55402, declare that on September 28, 2017, I caused the following documents:

- **NOTICE OF RECLAMATION DEMAND OF KAIJET TECHNOLOGY INTERNATIONAL LIMITED, INC.**

to be served and filed electronically with the Clerk of the Bankruptcy Court through ECF, and that ECF will send an e-notice of the electronic filing to all parties registered to receive electronic service.

And I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: September 28, 2017

By: /e/ Jeffrey D. Klobucar

Jeffrey D. Klobucar (MN #0389368)